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27 *its Department of Corrections*

28 **UNITED STATES DISTRICT COURT**

1 **DISTRICT OF NEVADA**

2 DONALD WALDEN, JR., et al., etc.,

3 CASE NO: 3:14-cv-00320-MMD-WGC

4 Plaintiffs,

5 v.
6 **STIPULATION AND ORDER TO**
7 **REQUEST THAT THE COURT EXTEND**
8 **DEADLINE FOR FILING RENEWED**
9 **MOTION TO SEAL**

10 **(FIRST REQUEST)**

11 THE STATE OF NEVADA, EX REL. NEVADA
12 DEPARTMENT OF CORRECTIONS, and
13 DOES 1-50,

14 Defendants.

15 Defendant the State of Nevada, *ex rel.* its Nevada Department of Corrections (“NDOC”) and
16 Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy
17 Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated (“Plaintiffs”),
18 by and through their respective counsel of record, hereby agree and request that the Court extend the
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Donald Walden, Jr., et al. v. The State of Nevada, et al.
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1 deadline set in ECR No. 392 regarding NDOC's renewed Motion to Seal¹, which is currently set for
2 April 18, 2022, by four (4) days, to April 22, 2022. This would also extend the date for Plaintiffs'
3 Reply, currently set for April 28, 2022, to May 2, 2022.

4 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
5 requested extension as the parties have been in communication about the exhibits to be filed under
6 seal. Counsel for NDOC has been conferring with Plaintiffs' counsel as to exhibits each believes
7 should or should not be sealed, and Counsel for NDOC has been conferring with its clients as to
8 limitations in the number of exhibits that need to be the subject of the motion. With the upcoming
9 holidays, Easter and Passover, additional time is needed in order to effectively analyze and confirm
10 each document and the exhibits to be successfully refiled before the Court. Accordingly, the parties
11 agree that the requested extension furthers the interest of this litigation and is not being requested in
12 bad faith or to delay these proceedings unnecessarily.

13 This is the parties' first request for extension of these deadlines.

14 DATED this 14th day of April, 2022.

15 WILSON ELSER MOSKOWITZ
16 EDELMAN & DICKER LLP

17 /s/ Sheri M. Thome
18 Sheri M. Thome, Esq.
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21 *Attorneys for Defendants The State of Nevada,
ex rel. its Department of Corrections*

21 DATED this 14th day of April, 2022.

22 THIERMAN BUCK LLP

23 /s/ Joshua D. Buck
24 Mark R. Thierman, Esq.
25 Nevada Bar No. 8285
Joshua D. Buck, Esq.
26 Nevada Bar No. 12187
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Attorneys for Plaintiffs

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28 ¹ NDOC does not need an extension to be able to file the revised Motion to Exclude All Evidence from
Plaintiffs' Experts [ECF 351].

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ORDER

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GOOD CAUSE SHOWN, the extension requested is granted. Defendant has until April 22,
3 2022 to file a renewed Motion to Seal, as directed in this Court's Order dated April 7, 2022.
4 Plaintiffs have until May 2, 2022 to respond to Defendant's Motion.

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Dated this 18th day of April, 2022.

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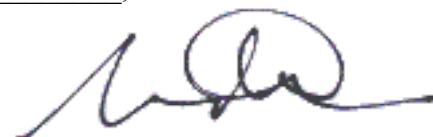
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UNITED STATES DISTRICT JUDGE